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SOUTHERN ILLINOIS ELECTRIC)
COOPERATIVE, an Illinois not-for-profit)
corporation, and CENTRAL ILLINOIS PUBLIC)
SERVICE COMPANY d/b/a AmerenCIPS,)
an Illinois Corporation.)

DOCKET NO:

08-0595

Joint Petition for Approval of Amendment)
No. 1 to Service Area Agreement dated)
February 27, 1970, Between Central Illinois)
Public Service Company d/b/a AmerenCIPS and)
Southern Illinois Electric Cooperative)

STIPULATED MOTION FOR A PAPER HEARING

NOW COME the parties, Central Illinois Public Service Company d/b/a AmerenCIPS ("AmerenCIPS"), by Brown, Hay & Stephens, LLP, Scott C. Helmholz and Charles Y. Davis, and Southern Illinois Electric Cooperative ("SIEC"), and hereby seek leave to conduct the above-captioned proceedings as a Paper Hearing pursuant to 83 Ill.Admin.Code §200.525. In support of this request, the parties state as follows:

1. The parties have filed a Joint Petition under Section 6 of the Electric Supplier Act (220 ILCS 30/6), seeking approval of an amendment to a previously approved service area agreement between the parties.

2. Attached to the Joint Petition is a true and correct copy of the parties' original Service Area Agreement (marked for identification purposes as Exhibit "1") and a true and correct copy of Amendment No. 1 to the Service Area Agreement (marked for identification purposes as Exhibit "2"), containing maps and drawings depicting and establishing the location of the Union County Corridor and Alexander County Corridor, and the proposed boundary change in Johnson County, as indicated by the dashed, yellow and/or pink highlighted lines thereon (marked for identification purposes as Exhibits "A," "B" and "C").

3. The Rules of Practice of the Illinois Commerce Commission permit the parties and Staff participating in a proceeding to stipulate to the waiver of a hearing and to the resolution of the matter based solely on the written pleadings and affidavits in a process called a Paper Hearing. 83 Ill.Admin.Code §200.525(a). Such a stipulation may be filed at any time prior to the date the Administrative Law Judge marks the case Heard and Taken. 83 Ill.Admin.Code §200.525(d). The stipulation is subject to the approval of all parties, Staff and the Administrative Law Judge. 83 Ill.Admin.Code §200.525(b).

4. The parties agree that a Paper Hearing would be an efficient means of resolving the Joint Petition, as it appears there are no areas of controversy.

5. Attached hereto and marked for identification purposes as Joint Stipulation Exhibit "A" is a stipulation to be signed by the Staff member in the event one is assigned to this docket prior to the preparation of an order for Commission consideration. In the event no Staff member is assigned, both signatories to this Stipulation expressly waive the necessity of having Staff review this Petition and/or file a Staff Stipulation.

6. An affidavit supporting the Stipulation and Exhibits is attached hereto and marked for identification as Joint Stipulation Exhibit "B".

7. AmerenCIPS prepared and circulated a Draft Order, attached to this Stipulated Motion as Joint Stipulation Exhibit "C".

WHEREFORE, the parties request that this proceeding be conducted as a Paper Hearing and that an Order substantially similar to the Draft Order attached to this Stipulated Motion as Joint Stipulation Exhibit "C" be entered.

Southern Illinois Electric Cooperative

By: _____

Larry Lovell
General Manager/
Executive Vice President
Southern Illinois Electric Cooperative

Central Illinois Public Service Company,
d/b/a AmerenCIPS

By: _____

Charles Y. Davis
Scott C. Helmholz
Charles Y. Davis
Attorneys for AmerenCIPS
Brown, Hay & Stephens, LLP
205 South Fifth Street, Suite 700
Springfield, IL 62701

State of Illinois)

)ss

County of Massac)

I, Larry Lovell, as General Manager/Executive Vice President of **Southern Illinois Electric Cooperative**, have read the foregoing Amendment No. 1 to the Service Area Agreement filed in the above cause, know the content thereof and know the same is true to the best of my knowledge, information and belief, and I affirm that I am a duly authorized officer of Southern Illinois Electric Cooperative with authority to execute Amendment No. 1 on behalf of Southern Illinois Electric Cooperative

Larry Lovell
Larry Lovell

Subscribed and sworn to before me this 27th day of October, 2008.

Michael Logeman
Notary Public



State of Illinois)

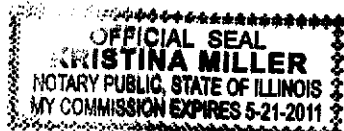
)ss

County of Sangamon)

I, **Charles Y. Davis**, as Attorney for **AmerenCIPS**, have read the foregoing Amendment No. 1 to the Service Area Agreement filed in the above cause, know the content thereof and know the same is true to the best of my knowledge, information and belief, and I affirm that I am duly authorized to execute Amendment No. 1 on behalf of AmerenCIPS.

Charles Y. Davis
Charles Y. Davis

Subscribed and sworn to before me this 3rd day of November, 2008.



Kristina Miller
Notary Public